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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

BED BATH & BEYOND INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-13359 (VFP)

(Jointly Administered)

**APPLICATION FOR ORDER SHORTENING TIME
REGARDING MOTION TO SEAL**

¹ The last four digits of Debtor Bed Bath & Beyond Inc.'s tax identification number are 0488. A complete list of the Debtors in these Chapter 11 Cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 650 Liberty Avenue, Union, New Jersey 07083.

Michael Stores, Inc. “Michaels”), by and through its undersigned counsel and having filed substantially contemporaneously herewith the motion [Docket No.] (the “Seal Motion”)² for entry of an order authorizing Michaels to file under seal **Exhibit A** to the *Declaration of Todd Powers in Support of Michaels Stores Inc. ’s Reply to Objection of Pinnacle Hills, LLC to Debtors’ Motion for Order Authorizing Debtors to Assume and Assign Lease for Store No. 1142* [Docket No. 1384] (the “Declaration”), hereby submits this application (the “Application”) shortening the time period required by D.N.J. LBR Rule 9013-2(a) pursuant to Fed. R. Bankr. P. 9006(c)(1), and that an order be entered substantially in the form submitted herewith for the reasons set forth below:

1. Michaels respectfully requests that the hearing on the Seal Motion be scheduled for July 18, 2023 at 2:30 p.m., contemporaneously with the hearing scheduled on the Assumption Notice and the Debtors’ proposed assumption of the BBY Lease to Michaels.

2. As set forth in the Seal Motion, Michaels seeks to file under seal **Exhibit A** to the Declaration in support of the Reply [Docket No. 1383] to the Landlord Objection because the Declaration contains confidential, commercially sensitive information of the Debtors and the Landlord.

3. The hearing on the Lease Sale Procedures Order and the Assumption Notice is scheduled for July 18, 2023 at 2:30 p.m.

4. Therefore, reduction of the time period as requested in this Application and pursuant to the annexed proposed order is necessary and appropriate and not otherwise prohibited under Fed. R. Bankr. P. 9006(c)(2).

² Capitalized terms used but not otherwise defined shall have the meanings ascribed to such terms in the Seal Motion or *Michaels Stores Inc. ’s Reply to Objection of Pinnacle Hills, LLC to Debtors’ Motion for Order Authorizing Debtors to Assume and Assign Lease for Store No. 1142*, as applicable.

Dated: July 17, 2023

Respectfully submitted,

LOWENSTEIN SANDLER LLP

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